



737 Bishop Street
Suite 1900
Honolulu, HI 96813

Via ECFS

September 23, 2005

Marlene H. Dortch
Office of the Secretary
Federal Communication Commission
445 12th Street SW
Washington, DC 20554

Re: WC DOCKET NO. 05-196 – **SUBSCRIBER ACKNOWLEDGEMENT REPORT
(SEPTEMBER 22, 2005)**

Dear Ms. Dortch:

Pursuant to the Enforcement Bureau's August 26, 2005 Public Notice (DA 05-2358) Pacific LightNet, Inc. (PLNI) hereby submits the following Subscriber Acknowledgment Report detailing the status of our efforts to comply with the notification and acknowledgment requirements of the FCC's *VoIP E911 Order*.¹ PLNI previously filed Subscriber Acknowledgement Reports on August 10, 2005 and September 1, 2005 in response to the Bureau's July 26, 2005 and August 26, 2005 Public Notices, respectively.

- Actions Taken To Comply with Notice and Warning Sticker Requirements:
 - PLNI has provided notice and warning stickers to 100% of its subscribers.
- Affirmative Acknowledgement Quantification, as of September 22, 2005:
 - Percentage of customers who have submitted an affirmative acknowledged: 92%
 - Percentage of customers from whom we do not expect to receive an affirmative acknowledge by September 28, 2005: 5%.
- Future Planned Actions With Respect to Any Subscribers That Do Not Affirmatively Acknowledge Having Received and Understood the Advisory, Including PLNI's Use of "Soft" Disconnect Procedures:
 - On September 20, 2005, PLNI "soft" disconnected non-compliant subscribers as a final attempt to obtain affirmative acknowledgements from such subscribers. In a "soft" disconnect all outbound calls made by the customer are rerouted to the PLNI customer service team, with the exception of calls to 911, which continue to be routed to the PSAP. Inbound callers hear a "caller is unavailable" message.
 - In addition to the actions reported in our previous Subscriber Acknowledgement Reports, PLNI has sent four email reminders since September 1, 2005 and has placed outbound calls to non-compliant customers in an attempt to bring them into compliance. PLNI will continue to contact non-compliant customers via outbound

¹ *IP-Enabled Services and E911 Requirements for IP-Enabled Service Providers*, First Report and Order and Notice of Proposed Rulemaking, 2005 WL 1323217, FCC, (rel. Jun 3, 2005).

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calls prior to September 28, 2005. All non-compliant customers will be hard disconnected on September 28, 2005.

- Company Compliance Contact
 - Michael Frane
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Sincerely,

Michael Frane
Director of Strategic Business Operations